

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
NORTHERN DIVISION

IN RE:  
KITTY ANN STRUNK

) CASE NO: 18-20265-705  
Debtor ) Chapter 13  
          ) Re: Objection to Claim 2 filed by  
          ) HOME POINT FINANCIAL CORP  
          ) Acct: 1136  
          ) Amount: \$169,629.70  
          ) Response Due: February 15, 2019  
          )

**TRUSTEE'S OBJECTION TO CLAIM 2**

**THIS OBJECTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE OBJECTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee in Bankruptcy, and for her objection to claim states as follows:

The claim of HOME POINT FINANCIAL CORP dated November 01, 2018, should be allowed, but the Court should enter an order directing that the claim will not be paid by the Trustee. The plan provides for surrender of the collateral. After sale of the collateral, the creditor may file an amended claim for the deficiency balance.

WHEREFORE Trustee prays the Court will enter its order sustaining this objection.

Dated: January 25, 2019

OBJCLM--SJC

/s/ Diana S. Daugherty

Diana S. Daugherty

Standing Chapter 13 Trustee

P.O. Box 430908

St. Louis, MO 63143

(314) 781-8100 Fax: (314) 781-8881

trust33@ch13stl.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on January 25, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on January 25, 2019.

KITTY ANN STRUNK  
10337 LEMGRI PLACE  
HANNIBAL, MO 63401

HOME POINT FINANCIAL CORP  
PO BOX 790309  
ST LOUIS, MO 63179

SOTTILE & BARILE LLC  
394 WARDS CORNER RD  
STE 180  
LOVELAND, OH 45140

HOME POINT FINANCIAL CORP  
11511 LUNA RD  
STE 300  
FARMERS BRANCH, TX 75234

/s/ Diana S. Daugherty  
Diana S. Daugherty, Chapter 13 Trustee